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11 *Attorneys for Defendant, Freakling Bros., Inc.*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

COVINGTON SPECIALTY INSURANCE  
COMPANY, a New Hampshire Corporation,

Case No.: 2:23-cv-00968-APG-VCF

Plaintiff,

vs.

FREAKLING BROS. INC., a Nevada  
Corporation; GRAND FLAMINGO  
CAPITAL MANAGEMENT, LLC., a Nevada  
Limited Liability Company; JA KENNEDY  
REAL ESTATE COMPANY, a Nevada  
Corporation,

**STIPULATION FOR EXTENSION OF  
TIME TO FILE OPPOSITION TO  
COVINGTON SPECIALTY  
INSURANCE COMPANY'S MOTION  
FOR SUMMARY JUDGMENT [ECF 37]**  
**(Second Request)**

Defendants.

Defendants, Freakling Bros., Inc. ("Freakling Bros.") and JA Kennedy Real Estate Company ("JA Kennedy," and with Freakling Bros., "Defendants"), and Plaintiff, Covington Specialty Insurance Company ("Covington" and with Defendants, the "Parties"), by and through their counsel of record, hereby stipulate and agree as follows:

1. On December 7, 2023, Covington filed its Memorandum of Points and Authorities in Support of its Motion for Summary Judgment [ECF No. 37] (the "Motion");
2. On December 22, 2023, the Parties stipulated to extend Defendants' deadline to respond to the Motion from December 28, 2023, to January 5, 2024 [ECF No. 40];

1           3. Defendants have requested an additional three business days to January 10, 2024 to  
2           file their Oppositions to the Motion;  
3           4. Under LR 7-2(b), Covington's reply will be due 14 days later on January 24, 2024;  
4           5. Counsel for Covington does not oppose the requested extension; and  
5           6. This is the second request for an extension which is made in good faith and not for  
6           purposes of delay.

7           **IT IS SO STIPULATED.**

8           DATED this 5th day of January, 2024.

9           WRIGHT, FINLAY & ZAK, LLP

10           /s/ Darren T. Brenner

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18           GARMAN | TURNER | GORDON

19           /s/ Eric R. Olsen

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9           MUSICK, PEELER & GARRETT LLP

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15           CHRISTIAN, KRAVITZ, DICHTER,  
16           JOHNSON & SLUGA, LLC

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21           *Attorneys for Plaintiff, Covington Specialty Insurance Company*

22           **IT IS SO ORDERED:**

23             
24           UNITED STATES DISTRICT JUDGE

25           DATED: January 8, 2024